From:	Kelsey Heilman
To:	Brannon, Jackson; Simon, Dan
Cc:	Cartier, Norah; Ped, Thomas; Omier, Michael; Banuelos, Liset; MariRuth Petzing; Ed Johnson; Melanie Maldonado
Bcc:	21-0264374@olc.legalserver.org
Subject:	Lovato v. Delta Hospitality Grp., Case No. 3:22-cv-00264-SB (D. Or.)
Date:	Monday, November 14, 2022 12:06:00 PM
Attachments:	Lovato v. Motel 6 Second Amended Complaint.pdf
	image001.png
	Lovato v. Motel 6 Second Amended Complaint - redline.pdf

Good morning, Jackson and Dan,

We have drafted a Second Amended Complaint in the *Lovato* matter. As we previewed in an email following the individual police officers' depositions, the primary change is the addition of a *Monell* claim against two new defendants: the City of Portland and the Portland Police Bureau. I have attached both clean and redline versions of the document so you can easily identify the new material.

Would you please review and respond to the following questions? If you'd like to discuss any of this by phone, let us know.

1. Will your clients consent to this amendment to the complaint?
2. Plaintiffs will require some additional discovery on the new claim, to include written discovery requests and a 30(b)(6) deposition of the City/PPB. If we amend (whether with your consent or with leave of the court), we propose the following extensions to the case schedule: fact discovery to close 1/31/22; dispositive motions due 3/3/22; PTO/ADR report due 30 days after dispositive motions ruling or 4/3/22. (We are thinking this would allow for written discovery to be served in November and produced in December, with the 30(b)(6) deposition to take place in January.) Does that sound acceptable to you?
3. Dan, are you authorized to accept service on behalf of the City of Portland and the Portland Police Bureau?
4. ███

Sincerely,

Kelsey

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Heilman Decl., Ex. 2, Pg. 2

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